

**SIP SUBMITTAL COMPLETENESS CRITERIA CHECKLIST**  
(in accordance with 40 CFR Part 51 - App. V)

SIP Submitted by: Pennsylvania

Date Submitted: January 17, 2003

Subject: Revised Motor Vehicle Emission Budget for the Pennsylvania Portion of the Philadelphia Ozone Nonattainment Area

**Completeness Review**

Completed by: Brian Rehn

Environmental Engineer

Air Quality Planning & Information Services Branch (3AP21)

Date Completed: April 21, 2003

**Administrative Materials**

EPA REQUIREMENT	STATE SUBMITTAL	ACCEPTABLE (X)
1. A formal letter of submittal from the Governor or his designee, requesting EPA approval of the plan or revision thereof.	1. A letter dated January 17, 2003 from David E. Hess, Secretary, Pennsylvania Department of Environmental Protection, formally submitting this SIP revision and requesting EPA approval.	X
2. Evidence that the State has adopted the plan in the State code or body of regulations; or issued the permit, order, consent agreement in final form. That evidence shall include the date of adoption or final issuance as well as the effective date of the plan, if different from the adoption/issuance date.	2. Not Applicable.  This plan document was not published in the state body of regulations, but the plan was submitted in final form, after having undergone public participation.	X
3. Evidence that the State has the necessary legal authority under State law to adopt and implement the plan.	3. Pennsylvania DEP has general authority under the state Air Pollution Control Act (Vol 35 § 4001).	X

# Administrative Materials

EPA REQUIREMENT	STATE SUBMITTAL	ACCEPTABLE (X)
4. A copy of actual regulation, or document submitted for approval and incorporation by reference into the plan, including indication of the changes made to the existing approved plan, where applicable. The submittal shall be a copy of the official State regulation/document signed, stamped, dated by the appropriate State official indicating that it is fully enforceable by the State. The effective date of the regulation/document shall, whenever possible, be indicated in the document itself.	4. A copy of plan document "State Implementation Plan (SIP) Revision for the Philadelphia Ozone Nonattainment Area - Revised Highway Emissions Budgets" dated January 2003.  Supporting information in the form of Appendices A through G were submitted as part of the SIP provided to support the MOBILE 6 budgets stated in the plan.	X
5. Evidence that the State followed all of the procedural requirements of the State's laws and constitution in conducting and completing the adoption/issuance of the plan.	5. The plan recalculates the mobile source VOC and NOx emission inventory for the Philadelphia area.  Evidence that the Commonwealth complied with state administrative procedure has not been provided (outside of the public participation process).	X
6. Evidence that public notice was given of the proposed change consistent with procedures approved by EPA, including the date of publication of such notice.	6. Pennsylvania published notices of availability of the proposed plan and a public hearing in three newspapers (The Mercury, Delaware County Daily Times, and the Philadelphia Inquirer). Notice was published in each newspaper on December 6, 7, and 9, 2002.	X
7. Certification that public hearings were held in accordance with the information provided in the public notice and the State's laws and constitution, if applicable.	7. A public hearing was held on January 7, 2003 at DEP's Conshohocken, PA office.	X

# **Administrative Materials**

EPA REQUIREMENT	STATE SUBMITTAL	ACCEPTABLE (X)
8. Compilation of public comments and the State's response thereto.	8. A document summarizing public comments received by DEP and their responses is included as part of the SIP revision.	X

## Technical Materials

EPA REQUIREMENT	STATE SUBMITTAL	ACCEPTABLE (X)
1. Identification of all regulated pollutants affected by the plan.	1. The plan quantifies volatile organic compound (VOC) and nitrogen oxide (NOx) air emissions. Refer to Table 1 of the plan for a summary of these emissions from mobile sources in the Pennsylvania portion of the Philadelphia ozone nonattainment area.	X
2. Identification of the locations of affected sources including the EPA attainment/nonattainment designation of the locations and the status of the attainment plan for the affected area(s).	2. The plan quantifies highway mobile source emissions of VOCs and NOx in the Pennsylvania portion of the Philadelphia ozone nonattainment area.  This area is classified is classified as a severe ozone nonattainment area. EPA approved an attainment demonstration for the Philadelphia area on October 26, 2001 (66 FR 54143).	X
3. Quantification of the changes in plan allowable emissions from the affected sources; estimates of changes in current actual emissions from affected sources or, where appropriate, quantification of changes in actual emissions from affected sources through calculations of the differences between certain baseline levels and allowable emissions anticipated as a result of the revision.	3. See response to #2 above.	X
4. The State's demonstration that the national ambient air quality standards, prevention of significant deterioration increments, reasonable further progress demonstration, and visibility, as applicable, are protected if the plan is approved and implemented.	4. The plan contains a demonstration that the revised highway mobile source emissions budget for VOC and NOx will not jeopardize the Philadelphia ozone attainment demonstration approved by EPA on October 26, 2001 (66 FR 54143).	X

## Technical Materials

EPA REQUIREMENT	STATE SUBMITTAL	ACCEPTABLE (X)
5. Modeling information required to support the proposed revision, including input data, output data, models used, ambient monitoring data used, meteorological data used, justification for use of offsite data (where used), modes of models used, assumptions, and other information relevant to the determination of adequacy of the modeling analysis.	5. Modeling support information is provided in Appendices B-F of the SIP. This includes information related to modeling methodology, summaries of modeled emissions, MOBILE modeling parameter, VMT projections, and sample modeling files.	X
6. Evidence, where necessary, that emission limitations are based on continuous emission reduction technology.	6 Not Applicable	N/A
7. Evidence that the plan contains emission limitations, work practice standards and recordkeeping/reporting requirements, where necessary, to ensure emission levels.	7. Not Applicable	N/A
8. Compliance/enforcement strategies, including how compliance will be determined in practice.	8. Not Applicable	N/A
9. Special economic and technological justifications required by any applicable EPA policies. (If a policy is not appropriate, explain why.)	9. Not Applicable	N/A
10. A Section 107 request must be accompanied by a maintenance plan demonstrating maintenance to the relevant NAAQS for at least 10 years after redesignation.	10. Not Applicable	N/A